

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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**CAROL HERAS, LISSETTE FIGUEROA,  
VIVIANA BOTERO, and KATHERINE  
MONSALVE, on behalf of themselves and  
other similarly situated,**

**INDEX NO: 12 CV 6138 (VVP)**

**Plaintiff,**

**v.**

**OTG MANAGEMENT, INC., OTG  
MANAGEMENT T8 LLC, LAGUARDIA  
USA LLC, and ERIC BLATSTEIN,**

**Defendants.**

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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and annexed materials, Plaintiffs, on behalf of themselves and all others similarly situated, by their undersigned attorneys, shall move the Court before the Honorable Victor V. Pohorelsky at the United States Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, on September 22, 2015 at 11:00 a.m., for an order preliminarily approving the class action settlement agreement and notice to the class.

Dated: New York, New York  
September 11, 2015

/s/ Denise A. Schulman  
D. Maimon Kirschenbaum  
Denise A. Schulman  
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*Attorneys for Plaintiffs, FLSA Collective Plaintiffs,  
and the Class*